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Attorneys for Defendants
 MILTON BLISS, et al.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

SCANVINSKI JEROME HYMES,
 Plaintiff,
 vs.
 MILTON BLISS, et al.
 Defendants.

Case No. 16-cv-04288-JSC

**DEFENDANTS' PROPOSED
 SUPPLEMENTAL VOIR DIRE**

Hearing Date: November 20, 2018
 Time: 1:00 p.m.
 Place: 450 Golden Gate Avenue
 Courtroom F, 15th Floor
 San Francisco, CA 94102

Trial Date: December 3, 2018

In light of the Court's ruling that the jury will hear Deputy Jones take the Fifth Amendment, the defendants' propose the following supplemental voir dire:

1. Everyone has the absolute right to exercise the protections afforded under the Constitution.

In this case, you may hear a witness refuse to answer questions based on his or her Fifth Amendment right. If so, I will instruct you on the law to apply.

a. Does everyone understand that this is a constitutional right?

b. Does everyone understand that this is a civil case, and not a criminal case?

- 1 c. Is there anyone who thinks that a person who invokes his Fifth Amendment right is
2 automatically less believable?
3 d. Will you follow the law according to my instructions?
4 e. Can you be fair?
5

6 Dated: November 27, 2018

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14 By: /s/ Renee E. Rosenblit
15 RENÉE E. ROSENBLIT

16 Attorneys for Defendants
17 MILTON BLISS, et al.
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